

RESPONSE TO COMMENTS
DRAFT FINAL RECORD OF DECISION
FOR OPERABLE UNIT 3 SITE 16, CRASH CREW TRAINING PIT NO. 2 AT
FORMER MCAS EL TORO, CALIFORNIA

<p>Originator: Nicole Moutoux U.S. EPA</p> <p>To: Andy Piszkin MCAS El Toro BEC</p> <p>Date: June 17, 2003</p>	<p style="text-align: right;">CLEAN 3 Program Contract No. N-68711-95-D-7526 CTO-0045 File Code: 0232</p>
<p><u>GENERAL COMMENTS</u></p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>1. Pg. 11-1, Section 11.2, Compliance with ARARs: First sentence states that remedial action will comply with the "substantive provisions of all ARARs." Since ARARs are by definition substantive standards, the phrase 'substantive provisions' is redundant and should be deleted.</p>	<p>RESPONSE 1: As is stated in the first paragraph on page 11-1, the selected remedial action will comply with ARARs established under federal and state laws unless a statutory waiver is justified. The substantive provisions apply to the most stringent of federal and state laws and regulations, which constitute ARARs. Therefore, the phrase "the substantive provisions of" will be deleted from the first sentence in Section 11.2.</p>
<p>2. Pg. 11-6, Section 11.2.1.4, Surface Water Chemical-Specific ARARs: This section states that the NPDES Permit No. CAG918001 will be used as TBC guidance to comply with these ARARs. It is Region 9's policy not to refer to TBCs in the ROD. I would suggest that we change the phrase "TBC guidance to comply with these ARARs as discussed below" to "determine the substantive requirements and comply with the ARARs discussed below." Whenever TBC appears in the text and ARARs Tables, please delete and make the suggested change.</p>	<p>RESPONSE 2: The DON does agree that the permit CAG918001 offers guidance to comply with the identified ARARs. To clarify that the permit is considered as guidance and is not considered an ARAR, "TBC" will be removed from the text in Section 11 and from Table 11-1. Please note that the discharge to storm water is only applicable if the contingency remedy is initiated and does not apply to the selected remedy.</p>
<p>3. Pg. 11-7, Section 11.2.1.4, Water Quality Control Plan, Santa Ana River Basin: Second sentence - "excepted for the Bee Canyon Wash" does not make sense. Is it "accepted?"</p>	<p>RESPONSE 3: This is the terminology used in the Water Quality Control Plan, Santa Ana River Basin. It means that the Bee Canyon Wash does not have the beneficial use for which it has been "excepted." Excepted means that the beneficial use has been excluded for the Bee Canyon Wash.</p>
<p>4. Pg. 11-9, Section 11.2.1.4, NPDES Permit Requirements: The last paragraph presents the DON's position regarding the site-specific NPDES Permit. DON states that it does not believe a site-specific permit is not necessary and that DON will comply with the substantive requirements of the general permit (NPDES Permit No. CAG918001). While EPA agrees that a permit is not required, DON has to comply with the substantive requirements of such a site-specific permit, not the general permit.</p>	<p>RESPONSE 4: The last paragraph in Section 11.2.1.4 was deleted since the previous paragraph describes DONs position in regard to the general permit. The second to last paragraph was revised to clarify that the DON will use the general permit and authorization to discharge thereunder as guidance to comply with effluent limitations and other federal and state ARARs identified for the discharge of groundwater to surface water as proposed for the contingency remedy at Site 16.</p>

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5. Pg. 11-12, Section 11.2.3.4, Institutional Controls: In the last paragraph, please delete the third sentence ("However, although US EPA does not agree....") In the fourth sentence, insert the specific regulation, i.e., 67391.1, after the word "regulation."	RESPONSE 5: The third sentence in the last paragraph of Section 11.2.3.4 was deleted. The first sentence was revised to state, "U.S. EPA does not agree with the DON and DTSC that the sections of the Cal. Civ. Code and Cal. Health & Safety Code cited above are ARARs because they fail to meet the criteria for ARARs pursuant to U.S. EPA guidance..." Additionally, the specific regulation was inserted after the word "regulation" in the last sentence of the paragraph.
6. Pg. 11-23,24, Table 11-2: EPA does not consider the DOT requirements as ARARs because they are requirements that do not apply to on-site activities. Please delete these DOT requirements in the ARARs Tables and put them in the text with an explanation that while DON does not consider these ARARs, DON will comply with these and all other off-site activities.	RESPONSE 6: As stated, the DON will comply with these regulations for off-site transportation if hazardous waste is generated onsite and transported off site. The inclusion of these regulations is consistent with the ROD for Site 24 for potential disposal of groundwater, drill cuttings, and/or treatment of spent carbon determined to be hazardous waste. Section 11.2.3.2 and Table 11-2 will be revised to clarify that the requirements apply to waste generated onsite that are determined to be hazardous.
7. Pg. 11-26, Table 11-2: SCAQMD 401 requirement seems out of place here. It should be part of the other Air requirements on p. 11-23.	RESPONSE 7: The air requirements on p. 11-23 are considered federal ARARs because they have been approved into the State Implementation Plan (SIP). SCAQMD Rule 401 is not part of the SIP and therefore is correctly included as a state ARAR.

**RESPONSE TO COMMENTS
DRAFT FINAL RECORD OF DECISION,
OPERABLE UNIT (OU) 3, INSTALLATION RESTORATION PROGRAM (IRP) SITE 16,
CRASH CREW TRAINING PIT NO. 2 AT
MCAS EL TORO, CALIFORNIA**

Originator: Rafat Abbasi, P.E. Department of Toxic Substances Control To: Andy Piszkin MCAS El Toro BEC Date: June 17, 2003	CLEAN 3 Program Contract No. N-68711-95-D-7526 CTO-0045 File Code: 0232
<p><u>COMMENTS</u></p> <p>The Department of Toxic Substances Control (DTSC) reviewed the subject document, dated May 19, 2003. The draft final Record of Decision (ROD) presents the remedy selected for Site 16 at the Former MCAS El Toro. As a result of firefighter training activities, residual fuels and combustible fluids were released to soil and groundwater beneath the site. No further action is recommended for shallow soil (0-10 feet below ground surface) based upon the results of a baseline human health risk assessment. A significant amount of volatile organic compounds (VOCs) was removed from vadose zone soil (10 feet bgs to groundwater) during pilot testing of the multi-phase extraction technology. This result in a selected remedy that consists of vadose zone monitoring, monitored natural attenuation of groundwater with a contingency remedy, institutional controls, and site grading.</p> <p>Based on our review, we have the following comments:</p>	<p><u>RESPONSES TO COMMENTS</u></p>
<p>1. DTSC regulation at title 22, California Code of Regulations, Section 67391.1. Please note that DTSC considers the regulation's requirement to include an implementation and enforcement plan to be a substantive requirement that ensures use restrictions are adequately protective of public health and safety and the environment. We believe the Site 16 ROD adequately addresses implementation and enforcement of the use restrictions and therefore this requirement of the regulation is met.</p>	<p>RESPONSE 1: Comment noted.</p>

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<p>Originator: Rafat Abbasi, P.E. Department of Toxic Substances Control</p> <p>To: Andy Piszkin MCAS El Toro BEC</p> <p>Date: June 17, 2003</p>	<p style="text-align: right;">CLEAN 3 Program Contract No. N-68711-95-D-7526 CTO-0045 File Code: 0232</p>
<p>2. We believe the "Memorandum of Agreement between the United States Department of the Navy and the California Department of Toxic Substances Control" dated March 10, 2000, along with its attached covenant models, should be added to the Administrative Record or included as an attachment to the Site 16 ROD for ease of public review. The Memorandum of Agreement is cited in Section 8.2.2.2.</p>	<p>RESPONSE 2: The "Memorandum of Agreement between the United States Department of the Navy and the California Department of Toxic Substances Control" dated March 10, 2000, along with its attached covenant models, is included in the Administrative Record as of April 2000.</p>
<p>3. Figure 8-3, Decision Tree-Post-ROD Vadose Zone Monitoring, appears to allow discontinuing both soil and groundwater monitoring based on soil gas data alone. ("Do soil gas data indicate an increase in VOC concentrations over time in any of the wells?" If no, then "Discontinue monitoring in vadose zone.") This should be addressed, either in the Site 16 ROD or in the Remedial Design, to ensure groundwater data is included in the decision to discontinue monitoring.</p>	<p>RESPONSE 3: Figure 8-3 presents the decision tree for Post-ROD Vadose Monitoring. This decision tree identifies the process for discontinuation of soil gas monitoring in the vadose zone at Site 16. Groundwater monitoring is addressed separately as part of the Alternative 2 in Section 8.2.2.3. The alternative estimates that groundwater monitoring will be conducted for a period of approximately 19 years (when concentrations of TCE remain below 5µg/L). Implementation of the MNA remedy will be developed during the remedial design phase and described in the Remedial Design reports. A clarification will be made in the Remedial Design reports to the decision tree for vadose zone monitoring to specify that only soil gas monitoring will be discontinued if certain criteria are met.</p>
<p>4. Figure 8-3, Decision Tree-Post-ROD Vadose Zone Monitoring does not specify when the 2-year period of quarterly monitoring begins. This should be addressed either in the Site 16 ROD or in the Remedial Design.</p>	<p>RESPONSE 4: A schedule for implementation of the remedy for Site 16 will be presented in the Remedial Design reports.</p>
<p>5. We believe that a footnote should be added in Table 8-1 to clarify that only TCE is listed as a Chemical of Concern because, even though other contaminants were detected in ground water, TCE constituted 99% of the risk.</p>	<p>RESPONSE 5: A discussion of VOCs reported in groundwater at Site 16 is presented in Section 5.2.3.5. Additionally, Section 7.5.3 and Table 7-2 present information of TCE in groundwater and note that TCE is the principal contributor to risk. Rather than revise this ROD, the Navy will consider clarifying the discussion on Chemicals of Concern in future RODs.</p>



CLEAN 3 Program
Bechtel Job No. 23818
Contract No. N68711-95-D-7526
File Code: 0232

IN REPLY REFERENCE: CTO-045/0051

July 22, 2003

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Ms. Karen Rooney, Code 02R1.KR
1220 Pacific Highway
San Diego, CA 92132-5190


Subject: Responses to Regulatory Agency Comments on the
Draft Final Record of Decision for Operable Unit 3 Site 16,
Crash Crew Training Pit No. 2. Former MCAS El Toro, California - Dated July 2003

Dear Ms. Rooney:

It is our pleasure to submit our Responses to Regulatory Agency Comments on Draft Final Record of Decision for Operable Unit 3, Site 16, Crash Crew Training Pit No. 2, Marine Corps Air Station, El Toro, California. This document was prepared under Contract Task Order (CTO) 0045 and Contract No. N68711-95-D-7526.

We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact John Scholfield at (619) 744-3093 or me at (619) 744-3004.

Sincerely,


Thurman L. Heironimus, R.G.
Project Manager

TLH/sp
Enclosure



BECHTEL ENVIRONMENTAL, INC.

CLEAN 3 TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-95-D-7526

Document Control No.: CTO-0045/0051

File Code: 0232

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Ms. Karen Rooney, Code 02R1.KR
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: July 22, 2003

CTO #: 0045

LOCATION: Former MCAS El Toro, CA

FROM: Thurman L. Heironimus
Thurman L. Heironimus, Project Manager

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Operable Unit 3 Site 16, Crash Crew Training Pit No. 2 - Dated July 2003

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